

Graham, Benita

From: Jones, Leslie
Sent: Monday, March 19, 2018 10:10 AM
To: Opila, MaryCate
Subject: RE: SO2 Limits
Attachments: Appendix K.pdf

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From: Opila, MaryCate
Sent: Monday, March 19, 2018 8:24 AM
To: Jones, Leslie <Jones.Leslie@epa.gov>
Subject: RE: SO2 Limits

The US steel facilities had Installation Permits out for public comment last August. Do you mean they revised them again?

Mary Cate Opila, P.E., Ph.D.
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From: Jones, Leslie
Sent: Friday, March 16, 2018 3:36 PM
To: Opila, MaryCate <Opila.MaryCate@epa.gov>
Subject: FW: SO2 Limits

Question for you....we talked about this in the kitchen a while back and I just spoke with Jason (see below). Have you seen any ACHD permits for US Steel Clairton recently? I want to talk more about the 'need' for an annual limit (when it's a short term 30 day rolling and how would you calc that?) But what worries me is that Jason said an update to an installation permit from 2009 had already gone out to public comment??? Would we even see that? I assume so but I also asked why it wasn't all rolled into the TV permit and he was like I have no idea why....

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From: Maranche, Jason [<mailto:Jason.Maranche@AlleghenyCounty.US>]
Sent: Wednesday, February 21, 2018 10:49 AM
To: Jones, Leslie <Jones.Leslie@epa.gov>
Subject: RE: SO2 Limits

Thanks, Leslie.

In this instance, our permit folks are updating the US Steel Clairton C Battery installation permit to include the short-term 30-day limits, but then they're also including a tons/year limit. I'm not sure how to interpret it. I think mathematically – although I haven't done any test calculations – that the tons/year could be greater than the converted short-term limit, while still maintaining compliance with the short-term limit.

Our emissions inventory folks may also be an issue, if they want to use emission factors instead of the methodology from the SIP (H2S grains converted to SO2). We're working on that as well.

-Jason

From: Jones, Leslie [<mailto:Jones.Leslie@epa.gov>]
Sent: Wednesday, February 21, 2018 9:01 AM
To: Maranche, Jason
Subject: RE: SO2 Limits

Hey Jason –

I will do some work on this and get back to you in a few days. I will say that short term rolling averages do need to go into the permits even if they like the tons/year limit. The facility needs to be complying with the 30 day rolling and should have the records to demonstrate compliance. I'll see what other facilities have done with my SIP colleagues as well as permitting.

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From: Maranche, Jason [<mailto:Jason.Maranche@AlleghenyCounty.US>]
Sent: Tuesday, February 20, 2018 12:28 PM
To: Jones, Leslie <Jones.Leslie@epa.gov>
Subject: SO2 Limits

Leslie,

Now that we have the SO2 limits from the SIP in place, I'm fielding questions from folks here about how to translate these values into other "forms." For example, our permit folks like to use a tons/year limit, but a 30-day rolling average lb/hr does not exactly translate into an annual limit with a simple conversion. Additionally, our enforcement staff are a little lost now with stack test results, and what to do with a lb/hr result compared to a 30-day avg.

Do you know of any other permits already issued for Region 3 that have incorporated averaged short-term limits into a longer period?

I should be in the office the rest of the day (and week). I figured a short email on this was easier than a "cold call."

-Jason



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